

### REMARKS

This application has been reviewed in light of the Office Action dated April 14, 2009. Claims 18-28 are pending. Claims 18 and 23 are in independent form. Claims 18-20 and 22-25 have been amended to define more clearly what Applicant regards as his invention. Favorable reconsideration is respectfully requested.

In the outstanding Office Action, Claims 18-20, 23-25 and 28 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication 2004/0153597 (Kanai et al.). In addition, Claims 21, 22, 26 and 27 were rejected under 35 U.S.C. § 103(a) as being obvious from *Kanai* in view of U.S. Patent Application Publication 2003/0172223 (Ying et al.).

Applicant submits that the independent claims, together with their dependent claims, are patentably distinct from the cited prior art for at least the following reasons.

Applicant notes again that according to preferred embodiments of the present invention, an information processing apparatus uses an AB type connector, which can be connected to a USB host, such as a personal computer, and a USB (slave) device, such as a digital camera (para. [0030] and *see* the general background information at [http://en.wikipedia.org/wiki/Universal\\_Serial\\_Bus#USB\\_OTG\\_Sockets:\\_Mini-AB.2C\\_Micro-AB](http://en.wikipedia.org/wiki/Universal_Serial_Bus#USB_OTG_Sockets:_Mini-AB.2C_Micro-AB)<sup>1</sup>). The apparatus has a device controller for realizing communication with a USB host (para. [0027]) and a host controller for realizing communication with a USB device (para. [0028]). Accordingly, the apparatus has a switching unit for

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<sup>1</sup> It is noted that this site is not cited as prior art, or as evidence of any sort, but is merely referred to as providing a clear discussion of this point.

determining whether *the single connector* is connected to a USB host or a USB device and connects the device/host controller with the USB host/device (para. [0029]).

Claim 18 recites, among other features, that “a connection unit having a plurality of connectors, wherein each connector is for the USB host apparatus and the USB device apparatus; ... a switching unit... determines the type of the apparatus connected to the connector, and if it is determined that the apparatus connected to that connector is the USB device apparatus, connects the USB device apparatus with the USB host controller and, if it is determined that the apparatus connected to that connector is the USB host apparatus, connects the USB host apparatus with the USB device controller.”

In the present invention as set out in Claim 18, therefore, *each* connector can receive *both types* of connectors - the USB host type and the USB device type, and the switching unit determines the type of the apparatus connected to each connector and switches the connection between the connector (the connected apparatus) and the controller.

The feature quoted above is not believed to be disclosed or suggested in *Kanai*. As Applicant understands, *Kanai* relates to a system where host control means and function (slave device) control means are both configured to operate (*see* Abstract, para. [0041]). Specifically, the *Kanai* system uses one connector for connecting to a host, with a function controller to realize communication with the host; it uses a separate connector in a different shape for connecting to a function, with a host controller to realize communication with the function (*see* para. [0003], [0013] and [0042], for example). The host and the function can operate simultaneously (*see* Fig. 1), or alternately as they share a signal transmission path (*see* Fig. 2 and 3 and para. [0051] and [0059]). In either case,

each connector can be connected and is always connected to only one of a host and a function, obviating any need for determining whether it is a host or a function that is connected to the connector. In *Kanai*, there is no disclosure of the connector corresponding to both USB type and the USB function assignment is fixed. This configuration is in direct contrast with the configuration according to preferred embodiments of the present invention.

The Office states on page 2 of the Office Action that a transceiver in *Kanai* is analogous to the connection unit of Claim 18. Applicant respectfully disagrees. A transceiver in *Kanai* connects a host/function controller with a function/host connector and serves merely to transmit signals (*see* para. [0042] and [0043] for example). It does not comprise one or more connectors and cannot possibly be “a connection unit having a plurality of *connectors*, wherein each connector is for the USB host apparatus *and* the USB device apparatus [emphasis added],” as recited in Claim 18. As noted previously, an actual connector in *Kanai* can be connected and is always connected to only one of a host and a function, and there is no uncertainty as to the type of apparatus to which it is connected (*see* also para. [0056], for example, and any figure). Therefore, the connection unit is missing from *Kanai*.

Furthermore, Applicant cannot determine whether it is the switching control register or the transceiver in *Kanai* that the Office considers as the switching unit of Claim 18, as the Office refers to the former on page 3 but the latter on page 8 of the Office Action. Applicant submits that either one is an incorrect analogy, at least because each connector in the *Kanai* system can be connected and is always connected to only one type of apparatus and thus it is not necessary to determine the type of apparatus that is

connected to the *connector* (even if it might be necessary to determine the type of apparatus that is “connected to” or transmitting signals to *the Kanai system*).

The switch control register is used simply for controlling the multiplexer connected to the host controller and function controller and thus for selecting one of the controllers (*see* para. [0051] and [0052]). It does not “determine the type of the apparatus connected to the connector,” as recited in Claim 18. On the other hand, a transceiver simply transmits signals between a host/function controller and a function/host, as noted previously. It also does not “determine the type of the apparatus connected to the connector,” as recited in Claim 18. Certainly, then, the switching unit is also missing from *Kanai*.

Accordingly, for at least the reasons discussed above, Claim 18 is believed patentable over *Kanai*.

Independent Claim 23 is a method claim corresponding to apparatus Claim 18, and is believed to be patentable over *Kanai* for at least the same reasons as discussed above in connection with Claim 18.

A review of the other art of record, including *Ying*, has failed to reveal anything which, in Applicant’s opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or the other of independent Claims 18 and 23, and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the

invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place this application in condition for allowance and its entry is therefore believed proper under 37 C.F.R. § 1.116. In any event, however, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, he is respectfully requested to contact Applicant's undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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